



STATE OF MARYLAND  
DEPARTMENT OF HEALTH AND MENTAL HYGIENE  
OFFICE OF ENVIRONMENTAL PROGRAMS  
P.O. BOX 13387  
201 W. PRESTON STREET  
BALTIMORE, MARYLAND 21203  
(301) 383-6650

BD ✓

SITE COMPLAINT

NUMBER	DATE
SC-0- 87-034	07/18/86

1. Name of violator: BALTIMORE POST OFFICE  
Address: 60 WEST OLIVER STREET MD 21201  
County: BALTIMORE, MD 21201 Phone: 301-635-8933

2. Violation Type (with reference to Maryland Code)

☐ Water Pollution Control and Abatement (Health Environmental Article, Sections 9-301 through 9-344)

☒ Controlled Hazardous Substances (Health Environmental Article, Sections 7-201 through 7-268)

☐ Landfills and Sludge Disposal (Health Environmental Article, Section 9-210)

☐ Other

3. Specifically: On June 3rd 1986 I inspected the facility and gave  
them till July 3rd 1986 to comply with COMAR 10.51.03.05, 10.51.05.02  
10.51.05.04 and 10.51.05.09.

4. The existence of the above-mentioned violation(s) may subject you to prosecution and penalty. Accordingly, you are advised that the following corrective actions are necessary to remedy the violation(s).

At present there are <sup>EIGHT</sup> waste drums in the facility.  
BALTIMORE Post OFFICE has till August 4th 1986 to ship the  
waste drums, to develop a contingency plan & emergency procedures  
and to build a containment area.

5. Continuation of the violation(s) or failure to take the corrective action described above may result in the Department seeking legal sanctions against you, including the imposition of civil and/or criminal penalties.

6. "I hereby acknowledge receipt of this Site Complaint by my signature, which is not an admission of guilt."

Person issued to: Ronald N. Bonfort Jr.

Title: Asst. Dir. Mgmt.

Authorized by: William Eichbaum  
Assistant Secretary for  
Environmental Programs

Issued by: Signe Kotta  
Inspector

Phone: 301-295-5731



Dye ✓

State of Maryland  
Department of Health and Mental Hygiene  
Office of Environmental Programs  
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RERA Follow up Date 08/26/86

Facility Name: US Postal Service

Remarks: Vehicle Maintenance

60 West Oliver Street  
Baltimore, MD. 21201

~~HAZARDOUS WASTE~~

On August 4<sup>th</sup> 1986 U.S. Postal Service  
was ordered to build a containment area for the  
hazardous waste and to develop a contingency  
plan and emergency procedures.

On the above date I met with Mr.  
Peters Leonard for a follow up inspection. The  
following was noted: The containment area  
for the hazardous waste is built. The contingency  
plan and emergency procedures is developed.

The facility must give a classroom  
on site training for the facility personnel.

Observer: Jessie Retta

DHMH 3879

Person Interviewed: Paul [Signature] 8-26

Hazardous Waste Quantity Notification

Business Name

U.S. POSTAL SERVICE  
Superintendent, Vehicle Maintenance

Business Address

60 W. Oliver Street  
Baltimore, Maryland 21233-9603

EPA ID Number

M D D 98 070 7483

**Hazardous Waste Generated**

0 - 100 kg/month

☐

100 - 1000 kg/month

☒

1000 kg/month or more

☐

A. D. Redd, Supt. Veh Maint

Signature and Title



Official Business  
Penalty for Private Use  
\$300

FIRST-CLASS MAIL  
POSTAGE & FEES PAID  
EPA  
PERMIT NO. G-35

United States  
Environmental Protection  
Agency

Washington DC 20460

JOHN A ARMSTEAD  
VA/WV SECTION (3HW31)  
US EPA REGION III  
841 CHESTNUT ST.  
PHILADELPHIA, PA 19107

EPA Form 5180-11 (5-79)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
FACILITY INSPECTION PROGRAM  
Environmental Science Center  
701 Mapes Road  
Fort Meade, Maryland 20755-5350  
(410) 305-2779**

**Enforcement Confidential, Attorney Client Privilege**

**Subject:** Multi Media Compliance Inspection  
U. S. Postal Service, Baltimore Vehicle Maintenance Facility

**To:** Samantha Fairchild, Director, OECEJ (3EC00)

**From:** Gerard Crutchley, OECEJ (3EC10)

On November 24, 2003, Gerard Crutchley and Jose Jimenez with EPA Region III's Office of Enforcement, Compliance and Environmental Justice (OECEJ) accompanied by a representative from the Maryland Department of the Environment (MDE) conducted a multi media compliance inspection at the U.S. Postal Service's Baltimore Vehicle Maintenance Facility located at 60 W. Oliver St. in Baltimore, Maryland. Following are the findings from the inspection:

1. At the time of the subject inspection wash water with some oil and anti freeze was observed flowing into a storm water drain in the parking lot behind the facility building. According to the MDE representative, the State of Maryland requires that any facility where vehicles are stored must apply for a general storm water discharge permit. The facility did have a storm water permit until February 2000 when they requested an exclusion from the permit requirements. Apparently the exclusion was granted but it was not known if the State was aware that the facility stored vehicles at their site. During the inspection, the MDE representative informed facility personnel that within fourteen days of the inspection they would need to obtain coverage under a General Industrial Permit and within thirty days develop a storm water pollution prevention plan.
2. The facility has a paint spray booth that they use for vehicle refinishing. The facility was issued an air permit which contains specific limitations for the amounts of volatile organic compounds (VOC) contained in paint/coating products used for vehicle refinishing. Based on a comparison of the permit limitations with the amounts of VOCs in the paint/coating products purchased by the facility, it appears that the facility exceeded the limitations in their permit.
3. The facility's paint spray booth is equipped with 40 exhaust filters and 8 intake filters. According to facility personnel, they change out the filters about every six months and the

dirty filters are disposed of as regular trash. The facility has never had the filters tested to determine if they could be categorized as hazardous waste.

## VEHICLE MAINTENANCE FACILITY



December 6, 2004

Samantha P. Fairchild, Director  
Office of Enforcement, Compliance and Environmental Justice  
United States Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Dear Ms. Fairchild

I received the attached letter indicating that a Notice of Violation was issued for the U.S. Postal Service Baltimore Vehicle Maintenance Facility at 60 W Oliver Street, Baltimore MD. I have contacted DPRA Inc. and a representative will be here tomorrow, December 7, 2004 to obtain a sample of the paint booth filters. The representative, Jon Kallen, could not give me an exact date of completion, but indicated that it should be within the thirty days allowed in your letter.

As soon as the results are available I will send them to you.

Sincerely

A handwritten signature in black ink, appearing to read "Leonard C. Peters". The signature is fluid and cursive, with the first name being the most prominent.

Leonard C. Peters  
Manager Vehicle Maintenance  
U.S. Postal Service  
Baltimore MD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Leonard Peters, Manager  
United States Postal Service  
Baltimore Vehicle Maintenance Facility  
60 W. Oliver Street  
Baltimore, Maryland 21201-5783

**Re: Notice of Violation**  
**Compliance Evaluation Inspection**  
**November 24, 2003**  
**Baltimore Vehicle Maintenance Facility**  
**EPA ID No. MDD980707483**

**Docket No.: R3-05-NOV-RCRA-04**

Dear Mr. Peters:

On November 24, 2003, the U.S. Environmental Protection Agency, Region III ("EPA") conducted a Compliance Evaluation Inspection ("CEI") under the Code of Maryland Annotated Regulations ("COMAR") and the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. This CEI was part of a multi-media inspection conducted at your facility. Based on the inspection, EPA has determined that the United States Postal Service - Baltimore Vehicle Maintenance Facility ("BVMF" or the "Facility") was in violation of regulations promulgated under the COMAR and RCRA. As a result of this finding, the Agency is issuing this **Notice of Violation (NOV)**. The specific violation is:

1. At the time of the November 24, 2003 inspection, the EPA inspectors observed the facility's paint spray booth equipped with an air circulation system that contains 40 exhaust filters and 8 intake filters. According to facility representatives, the spent air filters had never been analyzed for hazardous characteristics. The filters are changed about every six months, and are disposed as regular trash.

Under COMAR 26.13.03.02, a person who generates a solid waste, as defined in COMAR 26.13.02.02, shall determine if that waste is a hazardous waste using the following method: The person should first determine if the waste is excluded from regulation under COMAR 26.13.02.04 - .04-5. He shall then determine if the waste is listed as a hazardous waste in COMAR 26.13.02.15 - .19. If the waste is not listed as a hazardous waste in COMAR 26.13.02.15 - .19, he shall determine whether the waste is identified by either: (a) Testing the waste or (b) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.



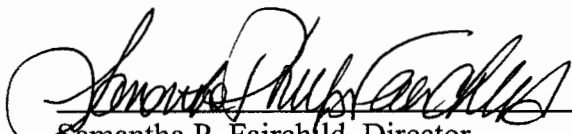
BVMF failed to determine whether the spent air filters were hazardous waste, as required under COMAR 26.13.03.02.

A copy of the inspection report was sent to your office on February 10, 2004, but an extra copy of the report, documenting the findings of the EPA's inspectors, is enclosed for your information.

Within thirty (30) calendar days of the receipt of this NOV, please submit documentation of any measures the United States Postal Service - Baltimore Vehicle Maintenance Facility has taken or is taking to achieve compliance with the regulation noted above or provide an explanation of facts and circumstances that cause you to believe that EPA's determination of the alleged violation is in error. If the compliance measures identified are planned or are on-going, please provide a schedule for completing the compliance measures. Section 3008(a) of RCRA authorizes EPA to take an enforcement action whenever it is determined that any person has violated, or is in violation, of any requirement of RCRA as amended. Such an action could include a penalty of up to \$27,500 per day of violation. In addition, failure to achieve and maintain compliance with the regulation cited in this NOV may be treated as a repeated offense and may constitute a "knowing" violation of Federal law.

This NOV is not intended to address all past violations, nor does it preclude EPA from including any ongoing, including the ones cited in this letter, or past violations in any future enforcement action. The response to this NOV shall be addressed to:

José J. Jiménez  
U.S. Environmental Protection Agency - Region III  
Office of Enforcement, Compliance and Environmental Justice (3EC00)  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

  
Samantha P. Fairchild, Director  
Office of Enforcement, Compliance  
and Environmental Justice

11/23/04  
Date

Enclosure

cc: B. Dye (MDE) w/o enclosure  
G. Crutchley (3EC10)w/o enclosure  
J. Jiménez (3EC00)w/o enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**SUBJECT:** Notice of Violation  
United States Postal Service  
Baltimore Vehicle Maintenance Facility

November 5, 2004

**FROM:** José J. Jiménez, Environmental Engineer  
RCRA Compliance and Enforcement Branch (3EC00)

**TO:** Samantha P. Fairchild, Director  
Office of Enforcement, Compliance and Environmental Justice (3EC00)

I recommend that you sign the attached Notice of Violation which addresses a violation under the Code of Maryland Annotated Regulations ("COMAR"), and the Resource Conservation and Recovery Act ("RCRA"), by the United States Postal Service Baltimore Vehicle Maintenance Facility located in Baltimore, Maryland.

**A. Respondent**

United States Postal Service Baltimore Vehicle Maintenance Facility  
EPA ID No. MDD980707483

**B. Type of Action**

The recommended action is a Notice of Violation for a RCRA Subtitle C violation.

**C. Summary of the Case**

The United States Postal Service Baltimore Vehicle Maintenance Facility is a Conditionally Exempt Small Quantity Generator. The facility has not prior violations under the RCRA program. On November 24, 2003, the or Office visited the facility to conduct a multi-media inspection. Based on the inspection, EPA has determined that United States Postal Service Baltimore - Vehicle Maintenance Facility was in violation of regulations promulgated under the COMAR and RCRA.

At the time inspection, the EPA inspectors observed the facility's paint spray booth. The booth is equipped with an air circulation system that contains 40 exhaust filters and 8 intake filters. According to facility representatives, the spent air filters had never been analyzed for hazardous characteristics. The filters are changed about every six months, and are disposed of as regular trash.

Under state and federal requirements a generator of a solid waste shall determine if that waste is a hazardous waste

**D. State or City Involvement**

The State's enforcement contact was notified on October 28, on this coming enforcement action. On November 4, 2004, I spoke with Rick Johnson, from the Maryland Department of the Environment, to discuss this Notice.

**E. Respondent's RCRA History**

No violations over the last five years.

**F. EPA Policy Impact**

This case is consistent with EPA policy.

**G. Public and Congressional Relations**

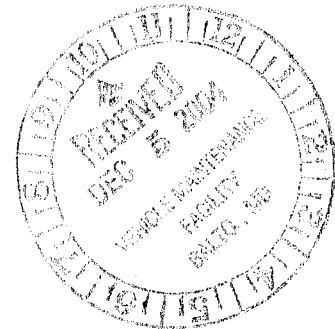
No special or congressional concern is expected in response to this action.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

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Leonard Peters, Manager  
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Baltimore Vehicle Maintenance Facility  
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**Re: Notice of Violation**  
**Compliance Evaluation Inspection**  
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**EPA ID No. MDD980707483**

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